

EXHIBIT “A”

Karl J. Sleight

From: Karl J. Sleight
Sent: Tuesday, February 6, 2024 12:59 PM
To: wmurphy@greecenry.gov; bmurph1121@yahoo.com
Cc: John Mancuso; koverton@wmbpllc.com
Subject: Interview Follow Up//Duty to Preserve Information

Mr. Murphy:

Thank you for speaking with me earlier today in connection with the pending federal lawsuit entitled *Robert Johnson v. Town of Greece, et. al.*, which includes broad allegations under the federal civil RICO statute.

Please keep the facts and circumstances discussed in your interview confidential, as disclosures from the interview by you could have a negative impact on the Town's position in the lawsuit.

As a point of follow up, as we discussed in your interview it is incumbent upon you to take measures to ensure that relevant and material information to this litigation is not accidentally or purposefully lost, deleted, etc. This includes electronically stored information (a/k/a ESI) in the form of text messages, email, voice messages, conversation apps (i.e. WhatsApp), etc. It also includes any traditional paper documents.

As you recall, the former Town Attorney Bill Lowe sent a communication to all town employees and officials in August, 2023 explaining the duty to preserve information. I have reproduced Mr. Lowe's communication below for you to ensure that you understand the issues. If you have any questions concerning your obligations, please do not hesitate to contact me or Town Attorneys John Mancuso or Kevin Overton with any questions.

Thank you for your time and attention to this matter.

Best regards,
Karl Sleight

Text of August 2023 Email from Town Attorney William Lowe

To follow up on my communication from earlier this week, the Town of Greece ("Town") and several employees of the Town are being sued by former Town employee Robert Johnson.

In any situation involving litigation the law requires that relevant and material information, documents, etc. be preserved. You should interpret "information" broadly to include both hard copy (paper) materials, and electronically stored information or "ESI". This would include information on mobile phones, laptop computers, etc. Please take all necessary steps to ensure such information is not lost, deleted, or destroyed. Because of the nature of the allegations and out of an abundance of caution, we are sending this communication as a broadcast to ensure that anyone who may have relevant and material information, documents, etc. receives the communication and acts accordingly to ensure the material is preserved.

I will provide additional information on this topic as we learn more about the litigation.

Thank you for your assistance and cooperation with this matter. If you have any questions, please do not hesitate to contact me.

Bill

Karl J. Sleight
Partner



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